

EXHIBIT A

Edward G. Krowiak, Esquire
Minora Krowiak Munley Batyko
 Attorney I.D. No. 38502
 700 Vine Street
 Scranton, PA 18510
 Phone: 570-961-1616
 Fax: 570-558-1110

Attorney for Plaintiff
 Gloria Herrera

MAURI B. KELLY
 LACKAWANNA COUNTY

2022 OCT 17 P 2:44

Gloria Herrera
 26 Fall Lane
 Blakely, PA 18447

Plaintiff

vs.

Walmart Supercenter d/b/a Walmart, Inc.
 900 Commerce Boulevard
 Dickson City, PA 18519

Defendant

IN THE COURT OF COMMON PLEAS JUDICIAL
 DEPT. CIVIL DIVISION
 OF LACKAWANNA COUNTY
 CIVIL ACTION – LAW
 JURY TRIAL DEMANDED

NO. 2022-CV-3776

COMPLAINT

AND NOW COMES the Plaintiff, Gloria Herrera, by and through her counsel, Edward G. Krowiak, Esquire, and complains of the Defendant as follows:

1. The Plaintiff, Gloria Herrera, is an adult and competent individual and Citizen of the Commonwealth of Pennsylvania who currently resides at 26 Fall Lane, Blakely, Lackawanna County, Pennsylvania.
2. The Defendant, Walmart Supercenter d/b/a Walmart, Inc., (hereinafter referred to as "Walmart") is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, having a principal place of business located at 900 Commerce Boulevard, Dickson City, Lackawanna County, Pennsylvania.
3. On or about September 23, 2020 Plaintiff, Gloria Herrera, as a business invitee entered the Defendant, Walmart, as set forth above for the purpose of shopping.
4. On the aforesaid date at approximately 11:00 a.m. Plaintiff, Gloria Herrera, was perusing the clearance aisle, when suddenly and without warning she slipped and fell on a slippery foreign substance on the floor causing Plaintiff to fall landing hard on her right side of her body.

5. The accident in question was caused solely by the negligence and carelessness of the Defendant and no way due to any act or failure to act upon the part of the Plaintiff.
6. The negligence and carelessness of the Defendant consisted of the following:
 - (a) Failed to warn of a dangerous slippery condition on the floor when they knew or should have known that the condition existed within a reasonable length of time;
 - (b) Defendant failed to take proper precautions to ensure the safety of the Plaintiff who was a business invitee of the premises/facility;
 - (c) Failed to perform adequate inspection of the area, which would have revealed the existence of a dangerous condition;
 - (d) Allowed a dangerous condition to exist for an unreasonable length of time without proper reasonable inspection of same;
 - (e) Failed to warn of the dangerous condition or take proper safety precautions to prevent the Plaintiff's fall and injuries; and
 - (f) Failed to take proper precautions to ensure the safety of Plaintiff.
7. The Plaintiff's fall and ensuing injuries are a direct result to the negligence and carelessness of said defendant, WALMART, Plaintiff, Gloria Herrera, sustained painful injuries to her body including but not limited to right shoulder contusion, right elbow contusion, right hip contusion, bilateral carpal tunnel syndrome, cervical strain/sprain, lumbar sprain/strain, aggravation of underlying sciatica and bruises in and about her body.
8. As a result of the negligence of the Defendant, its agents, servants, workmen and/or employees, as aforesaid, the Plaintiff, Gloria Herrera, has experienced great pain and suffering, and claim is made therefore.

9. As a result of the negligence of Defendant, its agents, servants, workmen and/or employees, the Plaintiff, Gloria Herrera, was forced to incur liability for medical treatment, medications, hospitalizations and similar miscellaneous expenses in an effort to restore herself to health, and claim is made therefore.
10. As a result of the negligence of Defendant, its agents, servants, workmen and/or employees, the Plaintiff, Gloria Herrera, has undergone and in the future will undergo great physical and mental suffering, great inconvenience in carrying out her daily activities, loss of life's pleasures and enjoyment, and claim is made therefore.
11. As a result of the negligence of Defendant, its agents, servants, workmen and/or employees, the Plaintiff, Gloria Herrera, has been and in the future will be subject to great humiliation and embarrassment, and claim is made therefore.
12. As a result of the negligence of Defendant, its agents, servants, workmen and/or employees, the Plaintiff, Deborah Gloria Herrera, continues to be plagued by persistent pain and limitation and, therefore, avers that her injuries may be of a permanent nature, causing residual problems for the remainder of her lifetime, and claim is made therefore.

WHEREFORE, Plaintiff, Gloria Herrera, demands judgment in her favor and against the Defendant, WALMART, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus all allowable interest and costs.

Respectfully Submitted,


MINORA KROWIAK MUNLEY BATYKO



EDWARD G. KROWIAK, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I, **EDWARD G. KROWIAK, ESQUIRE**, hereby verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief as relayed to me by Plaintiff, who was unavailable on a timely basis to verify said document.



Edward G. Krowiak, Esquire

EDWARD G. KROWIAK, ESQUIRE
Minora Krowiak Munley Batyko
Attorney I.D. 38502
700 Vine Street
Scranton, PA 18510
Phone: 570-961-1616
Fax: 570-558-1110

MAURI B. KELLY
LACKAWANNA COUNTY

2022 OCT 17 P 2:44

Attorney for Plaintiff
Gloria Herrera

CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

Gloria Herrera
26 Fall Lane
Blakely, PA 18447

Plaintiff

VS:

Walmart Supercenter d/b/a Walmart, Inc.
900 Commerce Boulevard
Dickson City, PA 18519

Defendant

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY
CIVIL ACTION – LAW
JURY TRIAL DEMANDED

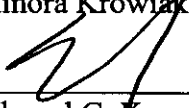
NO. 2022-CV-3776

CERTIFICATE OF COMPLIANCE WITH PUBLIC ACCESS POLICY

I hereby certify this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that request filing confidential information and documents differently than non-confidential information and documents.

Respectfully submitted,

Minora Krowiak Munley Batyko



Edward G. Krowiak, Esquire
Attorney for Plaintiff

Date: _____

10/11/22